

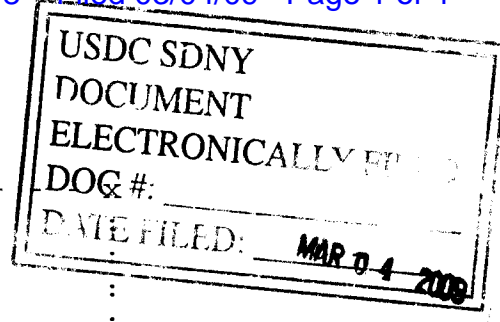
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

IGOR KOTLYAR,

Defendant.



INDICTMENT

09 ^{09 Cr.} CRIM 199

COUNT ONE

(Access Device Fraud)

The Grand Jury charges:

1. From at least in or about April 2008, through and including in or about October 2008, in the Southern District of New York and elsewhere, IGOR KOTLYAR, the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, did effect transactions, with one and more access devices issued to another person and persons, to receive payment and other things of value during any one-year period the aggregate value of which is equal to and greater than \$1,000, to wit, KOTLYAR used credit cards issued to other persons, without their authorization, to book air charter services for his business.

(Title 18, United States Code, Sections 1029(a)(5) and 2.)

Judge Buchwald

COUNTS TWO THROUGH SIX(Wire Fraud)

The Grand Jury further charges:

2. On or about the dates set forth below, in the Southern District of New York and elsewhere, IGOR KOTLYAR, the defendant, unlawfully, willfully, and knowingly, having devised a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, a scheme to fraudulently book air charter services for his business using misappropriated identification and credit card information, did transmit and cause to be transmitted by means of wire and radio communication in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, to wit, KOTLYAR transmitted by facsimile and electronic mail, among other things, misappropriated credit card and driver license information of other persons, and documents bearing false signatures, from New York, New York to the locations set forth below.

<u>Count</u>	<u>Approx Date of wire</u>	<u>Location of Wire Recipient</u>
Two	May 19, 2008	North Carolina
Three	May 23, 2008	North Carolina
Four	June 8, 2008	North Carolina
Five	June 13, 2008	North Carolina
Six	October 14, 2008	California

(Title 18, United States Code, Sections 1343 and 2.)

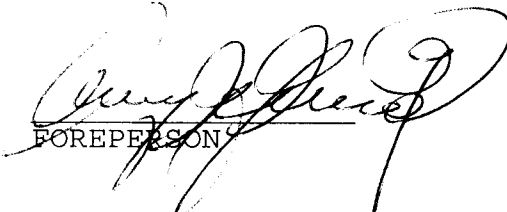
COUNT SEVEN

(Aggravated Identity Theft)

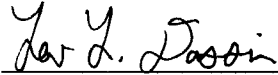
The Grand Jury further charges:

3. From in or about April 2008, through and including in or about October 2008, in the Southern District of New York and elsewhere, IGOR KOTLYAR, the defendant, during and in relation to felony violations enumerated in Title 18, United States Code, Section 1028A(c)(4) and (5), to wit, access device fraud in violation of Title 18, United States Code, Section 1029, and wire fraud in violation of Title 18, United States Code, Section 1343, as charged in Counts One and Two above, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit, KOTLYAR fraudulently used the means of identification of other real persons without these individuals' consent to obtain air charter services for his business.

(Title 18, United States Code, Sections 1028A(a)(1) and 2.)



FOREPERSON



LEV L. DASSIN
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

IGOR KOTLYAR,

Defendant.

INDICTMENT

09 Cr.

(Title 18, United States Code,
Sections 1028A, 1029, 1343 and 2.)

LEV L. DASSIN
Acting United States Attorney.

A TRUE BILL


Foreperson.

Handwritten notes:
to be brought to Barbara
10/10/09